

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:

Mark A. Sprague, Debtor)	Case No. 17-70212-JAD Chapter 13
<hr style="width: 30%; margin-left: 0;"/>		
JP Morgan Chase Bank, NA, Movant)	
vs.)	
)	Docket No.
Mark A. Sprague)	
Ronda J. Winnecour, Esq, Trustee)	Related to Claim 13
Respondent.)	

**DECLARATION THAT EXISTING CHAPTER 13 PLAN IS
SUFFICIENT TO FUND THE PLAN WITH MODIFIED DEBT**

AND NOW, comes the Debtor, Mark A. Sprague, by and through his counsel, Brian P. Cavanaugh, Esquire of Stewart, McArdle, Sorice, Whalen, Farrell, Finoli & Cavanaugh, LLC, and aver as follows:

1. On or about March 4, 2021, Lakeview Loan Servicing, LLC filed a Notice of Mortgage Payment Change indicating that the new mortgage payment would decrease from \$686.55 to \$634.01.
2. The undersigned declares that he has reviewed the existing plan, recomputed the plan payment and finds that the existing payment is sufficient to fund the plan.
3. The undersigned further declares that the plan remains adequately funded to pay the new post petition monthly mortgage payment.
4. The effective date of the new payment is April 1, 2021 per the Notice filed on March 4, 2021.

I, Brian P. Cavanaugh, being eighteen (18) years of age or older, hereby certify under penalty of perjury that the information contained in this document is true and correct to the best of my knowledge, information and belief.

Respectfully submitted,

Date: 03/08/2021

By: /s/ Brian P. Cavanaugh
Brian P. Cavanaugh
Attorney for Debtor
PA ID #72691

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